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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

BETTY DIANNE NEWELL, individually,

Plaintiff,

CASE NO: 2:17-cv-01126-MMD-VCF

v.

WFM SOUTHERN NEVADA, INC., A Foreign
Corporation dba WHOLE FOODS MARKET;
WFM WO, INC., A Foreign Corporation dba
WHOLE FOODS MARKET; DOES I through X,
and ROE CORPORATIONS I through X, inclusive,

Defendants.

STIPULATION AND ORDER TO
EXTEND TIME TO FILE PROPOSED
STIPULATION AND ORDER FOR
DISMISSAL

Pursuant to Local Rule IA 6-1, the parties respectfully request that this Court extend the deadline to file a proposed Stipulation and Order for Dismissal in the above entitled action for sixty (60) days, until February 8, 2019, for the reasons stated herein.

A Settlement Conference was held in this case on October 10, 2018 before Magistrate Judge Cam Ferenbach, during which the Court met and conferred with the parties and counsel, and a settlement agreement was reached. At that time the Court ordered a proposed Stipulation and Order for Dismissal must be filed on or before December 10, 2018. See Minute Order, Document 36 herein.

Plaintiff Betty Dianne Newell has signed a Release. However, final conditional payment information has been requested from Medicare, and confirmation of that lien amount is currently pending. Plaintiff's counsel is advised the lien balance should be received within the next thirty (30) to forty-five (45) days.


1 This stipulated request for an additional sixty (60) days, until February 8, 2019, to file a
2 proposed Stipulation and Order for Dismissal is submitted for the reasons explained herein, in
3 good faith, and not for purposes of undue delay.

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5 DATED this 7th day of December, 2018

DATED this 8th day of December, 2018

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ROBISON SHARP SULLIVAN & BRUST
A Professional Corporation
71 Washington Street
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9 By: 
10 STEVEN M. BAKER, ESQ.
11 Attorney for Plaintiff

By: /s/ Michael E. Sullivan
MICHAEL E. SULLIVAN, ESQ.
Attorneys for Defendant

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13 **ORDER**

14 IT IS SO ORDERED this 10th day of December, 2018.

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16 
17 UNITED STATES ~~DISTRICT~~ COURT

18 Magistrate
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